SURREY DORMOUSE GROUP COMMENTS ON APPLICATION 25/P/00967

Proposed mixed-use forestry and sustainable eco-retreat comprising of 32 tourist cabin accommodations with associated facilities, landscaping, parking and access.

Netherlands Wood, Albury Estate, Guildford, GU5 9TE

Having reviewed this proposal, Surrey Dormouse Group (SDG) would like to put forward the following comments, relating to the hazel dormouse *Muscardinus avellanarius* only. It is anticipated that other local specialist groups will comment in detail regarding their respective areas of expertise.

1. Overview

- The Dormouse Mitigation Handbook (Mammal Society, 2025) (DMH) provides detailed guidelines in relation to dormice and development. The proposal should now follow this guidance rather than that provided in the Dormouse Conservation Handbook (English Nature, 2006), which is out of date. It would be expected that surveys, mitigation, enhancements and ongoing management and monitoring for dormice in relation to this proposal follow the up to date guidelines from the 2025 active season onwards.
- It is considered that the development provides some positive measures for dormice by way of planting and the cessation of clear felling operations. The scoping out of the north western woodland is welcomed, as is the placement of the majority of proposed cabins away from the most wooded areas.
- SDG has concerns, however, should this proposal be approved, over the levels of disturbance likely from construction and the ongoing use of the site, in terms of noise and lighting, as well as the likelihood of visitor numbers increasing in the surrounding woodland, with the potential to disturb dormice, particularly at night as they are foraging.
- SDG has concerns over the thinning, felling and scrub management detailed within the Woodland and Biodiversity Management Plan and would like reassurance that any future woodland management operations are reviewed following the results of all ongoing surveys to ensure that the relevant guidelines are taken into account, in terms of methodology and particularly timing, especially with the potential use of heavy machinery. Plans within this report show areas that are considered to be suitable dormouse habitat but it must be acknowledged that dormice may be present in other areas and management operations be planned accordingly, regardless of the locations of individual records found during the surveys. It is vital that connections are maintained across the woodland and above any tracks, to allow for safe movement at canopy level.

2. The Hazel Dormouse

- The hazel dormouse is native and localised in the UK. It is a European and UK Protected Species and a conservation priority. Under IUCN Red List criteria, dormice are currently assessed as 'Vulnerable' to extinction in Britain, but recent work suggests a higher risk classification of 'Endangered'.
- Dormice are protected under the Wildlife and Countryside Act (WCA) 1981 (as amended) and other national and international legislation. It is an offence to intentionally or recklessly kill, capture, or disturb a dormouse and obstruct, damage or destroy its breeding site or resting place. A Natural England mitigation licence must therefore be sought for this development to allow construction to take place.
- Nationally, the dormouse population is estimated to have declined by over 70% since 2000 (The State of Britain's Dormice 2023, PTES) due in part to loss and fragmentation of habitat. Many of the

sites monitored by SDG reflect this national decline in terms of numbers of animals being found year on year. It is therefore imperative to ensure that any development takes place with due regard to dormice and to other protected species.

- Dormice require a mixed woodland, hedgerow or scrub habitat, to provide food and shelter, and can survive in small pockets of woodland where there is connectivity to other areas of suitable habitat. They are also known to use coniferous woodland, particularly where this is close to mixed deciduous woodland. They build their summer nests in low vegetation such as bramble as well as in tree holes, and their winter hibernation nests on the ground within, and at the edges of, this habitat.

- The Application site immediately abuts known dormouse habitat, monitored monthly under the National Dormouse Monitoring Programme, in addition to one historical record on the site itself. It is therefore considered likely that dormice use all woodland and scrub habitat on site.

3. Dormouse presence on site

- The DMH states that *"Anyone carrying out checks of dormouse nest tubes or nest boxes (or searching for natural nests for survey purposes) on sites where dormice are known or may reasonably be expected to be present should be registered on the relevant NE class licence […] (or be an Accredited Agent on one of these, […]). Any surveyors checking nest tubes or nest boxes need to have an appropriate level of expertise to recognise evidence of dormice when found."*

- There is no indication within the reports that surveyors are suitably licensed. A 'certificate in dormouse ecology' is mentioned, however, there is no mention of a licence. It is common practice to include surveyors' licence numbers within the reports; these are provided for other species but not for dormice. Clarity on surveyor experience and licence status is therefore required.

- Both the Preliminary Ecological Appraisal (PEA) (Morph Ecology, 2024 and the Ecological Impact Assessment (EIA) acknowledge the potential for dormice to be present in woodland and scrub across the site. Some compartments have been excluded from works, which is welcomed, although disturbance could still be an issue here. The PEA notes that *"The other compartments could not be ruled out for dormice present, as although less suitable, dormice will move higher into the canopy where there is less understorey provided the canopy is interconnected."*

- It is recognised that Paragraph 4.4.5 of the PEA states *"There was potential habitat noted for dormice, in particular the woodland compartments which had a denser understorey of broadleaved species, such as Assessment Area 18. The dense scrub compartment (Assessment Area 6) may also offer potential for dormice. Some compartments were suitable for hazel dormice, but these compartments will not be impacted by the works due to their already identified higher botanical value. The other compartments could not be ruled out for dormice present, as although less suitable, dormice will move higher into the canopy where there is less understorey provided the canopy is interconnected. There are nearby records of hazel dormice, as well as a historical site record. As such this further increases the likelihood that dormice may be present within the area of works. As such it is recommended that further surveys for dormice are carried out to fully establish the impacts of the proposals on dormice. After the results of these surveys, further recommendations will be provided for dormice."*

- The PEA states that *"Most of the woodland compartments were suboptimal for dormice, lacking a dense understory which dormice prefer."* A lack of understorey does not rule out the presence of dormice. The height of the trees, as mentioned above, particularly in the areas of coniferous woodland, and a lack of understorey is simply likely to mean that dormice are not recorded here as there is no reason for them to descend to the low level of the nest tubes. It should be assumed

they are also present here, at the very least commuting through the canopy, whether or not evidence is recorded during surveys.

- The DMH states that *"If dormice are present in one part of a site, then it should be assumed that they are present in any suitable connected habitat." "[…]detection of, or failure to detect, dormice in connected adjacent habitat would be acceptable justification for assuming dormouse presence or absence on site."*

- The PEA states that *"The desk study returned 56 records of hazel dormouse. A record was returned from the site (Assessment Area 18) from 2008 as well as records from 2022 relating to the woodland north of Assessment Area 23."*

- The DMH states that *"[…] Where such records are clearly reliable, are within the site boundary, there is no evidence that the habitat has changed and are less than 5 years old, they may be used as evidence for the presence of dormice on the site and provide the basis for a licence application. Records from the vicinity (within 3 km of the site boundary), which are less than 5 years old, and are in habitat that is not isolated from the target site may also be accepted. Older, or more distant records, or those from habitat which is not connected to the site may be taken as indications of the possible presence of dormice, but further surveys are normally required."*

- SDG holds records of a total of 849 dormouse sightings across 100 nest boxes in the woodland north of Assessment Area 23, from 2015 to end 2024, as part of the National Dormouse Monitoring Programme. All but the most recent of these have been shared with SBIC and would therefore have been provided as part of the desk study. It is possible that the 56 records refer to the number of monthly monitoring checks carried out over a period of time rather than the number of animals recorded.

- This woodland is connected to the site at the western boundary. As dormice will cross gaps of up to around 30m over open ground when dispersing to find new territories, with small gaps up to around 10m sometimes crossed in nightly foraging, despite the risk of predation, they may cross the open ground to the north in order to access the site.

- Despite the discrepancy in the number of records, the EIA states that *"The proximity of these records and suitability of habitat within the site has influenced the development design already, excluding the areas from the site boundary that are closest to the most recent record."* This is acknowledged and welcomed.

- The DMH provides details on the survey effort required to prove presence/infer likely absence using nest tubes in different quality habitats; clarification is therefore needed on the level of effort selected.

- Following the ongoing surveys, should this application be approved, the mitigation proposed in Paragraph 5.5 of the EIA must be reviewed, revised and expanded upon to ensure the current guidelines are followed.

4. Ongoing concerns

Lighting

- SDG is concerned over the disturbance from the use of the site itself, as well as the impact on the neighbouring areas, including the woodland to the north as well as the wider area, due to the anticipated increase in visitors, should this proposal go ahead.

- The introduction of new lighting is believed to cause disturbance to dormice, however, studies do

suggest that they can become habituated over time (Chanin & Gubert, 2012). Lighting can cause changes in invertebrate abundance, a primary food source for dormice, and dormice may be less likely to forage in areas subject to artificial lighting. Dormice may be more vulnerable to predation in areas with artificial lighting. Artificial lighting is believed to have negative effects on survival during hibernation (Juškaitis & Büchner, 2013).

- The degree of change from baseline light levels must therefore be taken into account, to ensure that lighting is designed so as not to increase predation and/or decrease food availability for dormice.
- The Amended Lighting Assessment report answers some of these concerns, nevertheless, any lighting at night, however minimal, is likely to have an impact on dormice in the immediate vicinity and, should this proposal be approved, care must be taken to ensure that the recommendations are carried out and that lighting is kept to an absolute minimum in all areas of the site.
- Construction must not take place after dark, to ensure nocturnal species are able to forage freely.

Noise and vibration

- The DMH states that *"There is an absence of information on the impact of noise and vibration for individuals or populations. It is known that dormice will flee from severe noise or vibration, and it is therefore plausible that repeated disturbances to lactating females could impact the survivorship of young. Likewise, repeated awakening of hibernating individuals is likely to have adverse consequences. However, very short-duration noise or vibration (minutes or hours) is unlikely to have any effect beyond the duration of the impact. For longer duration noise or vibration animals are more likely to habituate to low level continuous noise than they are to greater intensities or to intermittent exposure."*
- The time of year, and intensity and duration of noise and vibration during construction must therefore be considered, in order to minimise disturbance.
- The ongoing use of the site is likely to have an effect on any dormice present, with noise particularly concentrated in communal areas. Dormice are likely to move away from these areas and this may reduce foraging opportunities and/or increase the risk of predation. It is recommended, therefore, that communal areas are not used at night.

5. Conclusion

While the submitted reports address many of the known issues caused by development in dormouse habitat, which is acknowledged and welcomed, SDG is concerned over the ongoing use of the site and the potential impact on dormice from lighting and noise disturbance, at night whilst foraging as well as during the daytime, and from future woodland management operations.

Clearance and construction will have a sudden novel impact, which, coupled with an increase in visitors ad infinitum to the immediate area around the cabins, as well as the wider woodland and out into the surrounding area, will cause disturbance to all wildlife using these areas, both recorded and unrecorded. It is for these reasons that SDG objects to the proposal as being inappropriate for this location.

SDG looks forward to seeing the final survey results and subsequent recommendations, and the opportunity to comment further.

Kathryn Killner/SDG Committee 30/7/25